

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No.: 4:22-cr-102 AGF (DDN)
)	
JAMES DEAN KUKAN,)	
)	
Defendant.)	

**FIRST MOTION FOR EXTENSION OF TIME TO
FILE PRETRIAL MOTIONS**

COMES NOW Defendant, James Kukan, by and through counsel, and hereby moves this Court to extend the time to file pretrial motions by 40 days. In support of this motion, Defendant states as follows:

1. Defendant is confined at the Sainte Genevieve County Jail
2. Defendant has received the discovery provided by the Government but has not yet reviewed it in full or discussed it with counsel.
3. Additional time is thus necessary to provide “defendant...the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.” 18 U.S.C. § 3161(h)(7)(B)(iv).

WHEREFORE, Defendant respectfully requests this Court extend the time to file pretrial motions by 40 days.

Respectfully submitted,

By: */s/ Adam D. Fein*

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CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2022, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Mr. Kyle T. Bateman, Assistant United States Attorney.